To: CN=Kathleen Goforth/OU=R9/O=USEPA/C=US@EPA[]
Cc: CN=Karen Schwinn/OU=R9/O=USEPA/C=US@EPA[]

Bcc: []

From: CN=Carolyn Yale/OU=R9/O=USEPA/C=US

Sent: Mon 2/9/2004 4:47:34 PM

Subject: CCWD and Joint Urban Comments on WQCP Triennial Review

WQCP Scoping CCWD comments 1-2-04 FINAL.doc

Urban scoping comments WQCP Triennial Review 2-5-04.pdf

(embedded image) (embedded image)

[KMG NOTE: SEE BOLDED TEXT BELOW -- REVIEW MORE CAREFULLY WHEN WQS/DW SOURCE PROTECTION SURVEY GETS UNDERWAY]

RE your question re what's happening on Triennial Review. We didn't submit comments for the Triennial Review but, as the period was closing, we did get a request from Richard Denton of Contra Costa Water District to lend support for a workshop on drinking water quality. See info from Richard below.

Carolyn Yale, Ph.D. US EPA, WTR-3 75 Hawthorne St. San Francisco, CA 94105 phone: 415-972-3482 fax: 415-947-3537 yale.carolyn@epa.gov

----- Forwarded by Carolyn Yale/R9/USEPA/US on 02/09/2004 08:45 AM -----

Richard Denton < rdenton@ccwater.com> 02/06/2004 10:56 AM

To: Carolyn Yale/R9/USEPA/US@EPA

cc: Samantha Salvia <ssalvia@ccwater.com>

Subject: CCWD and Joint Urban Comments on WQCP Triennial Review

<<WQCP Scoping CCWD comments 1-2-04 FINAL.doc>> <<Urban scoping comments WQCP Triennial Review 2-5-04.pdf>>

Carolyn,

I appreciated the opportunity to talk with you today on this Triennial Review/drinking water protection issue. Please find attached CCWD's original written comments to the SWRCB (dated Dec 24) as well as a joint letter we sent to the SWRCB by yesterday's February 5 deadline.

What CCWD would like is:

- (a) that the SWRCB review the M&I objectives through a workshop as part of the Triennial Review (the joint urban letter is less specific than that)
- (b) the SWRCB adopt a narrative objective tied to the CALFED drinking water goal of 50 bromide and 3 TOC or a cost-effective equivalent level of public health protection (this would require all projects to head toward net wq improvement rather than arguing as they do now that there is plenty of assimilative capacity in the Delta up to the 250 mg/L Rock Slough chloride objective).

- (c) completion of the Central Valley RWQCB Drinking Water Policy process, and
- (d) actual improvement in the quality of the water we divert from the Delta, i.e., (b) above will have to actually result in improved water quality or, if not, we would need a new improved standard at our intakes.

The current 250/150 mg/L chloride objectives are not representative of what is needed if we are to be able to reliably meet future EPA drinking water regulations and therefore these current M&I objectives do not protect drinking water as a Delta beneficial use.

It would be helpful if EPA could also send a similar request to the SWRCB. It would probably be best to send the letter as a letter supporting CCWD's request as the official SWRCB deadline for submitting comments passed on February 5.

By the way, with respect to X2, we do not support relaxing X2 as it currently protects drinking water quality to some extent. In our Dec 24 letter we did point out though that if the Roe X2 were modified, that any water gain, should not just be shared between supply and fish but should be banked for specific use for water quality improvements in the fall.

If you have any questions please contact me at (925) 688-8187. Richard Denton

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> ----Original Message-----
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> From: Richard Denton

> Sent: Thursday, February 05, 2004 4:32 PM > To: 'GKapahi@waterrights.swrcb.ca.gov'

> Cc: Greg Gartrell; Tim Quinn (E-mail); Walt Wadlow (E-mail); Karl B. Stinson (E-mail)

> Subject: Joint Urban Comments on WQCP Triennial Review

>

> Gita,

> Please find attached a pdf file of joint urban water agency comments from Alameda County Water District (ACWD), Contra Costa Water District (CCWD), Metropolitan Water District of Southern California (MWD), and Santa Clara Valley Water District (SCVWD) regarding the scope of the State Board> '> s review of the May 1995 Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary.

>

- > The original of this letter is being sent to you today by surface mail. I will also fax you a copy just in case.
- > Richard Denton
- > Contra Costa Water District
- > (925) 688-8187

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